

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

CONDITIONAL MAJOR FINAL NO. F-05-014 REVISION 1

EARTHGRAINS BAKING COMPANIES, INCORPORATED

OWENSBORO, KY

FEBRUARY 6, 2007

RITA ARGUELLO, REVIEWER

SOURCE I.D. #: 021-059-00061

SOURCE A.I. #: 899

ACTIVITY #: APE20060001

**SOURCE DESCRIPTION:**

The source manufactures bread and buns. They submitted a request for permit renewal on September 19, 2002. Nothing has changed at the source since the time the previous permit was issued. The only significant change to the permit - aside from using the new template - is the addition of 401 KAR 61:020 requirements to the bread ovens. These requirements were inadvertently omitted from the original permit.

**CHANGES MADE TO THE PERMIT (REVISION 1):**

Earthgrains Baking Companies, Inc. – Owensboro Bakery made comments regarding the Draft Conditional Major Permit Number F-05-014 on January 29, 2007.

Earthgrains Bakery requested: Expiration date to be corrected.

Division responds: Agreed and correction was made.

Earthgrains Bakery requested: On Section B, condition 2(a) for each oven lists a particulate limits needed to be corrected based on  $E=4.10P^{0.67}$

Division responds: Agreed and correction was made. For a particulate emissions limit, using the equation provided in regulation 61:020 and the information of the maximum hourly throughput on the Bread Oven and the Bun Oven as 7,400 lb/hr and 3,400 lb/hr, to 9.85 lb/hr and 5.85 lb/hr, respectively.

Earthgrains Bakery requested: On Section B, condition 3(a) draft permit noted, “Compliance with the opacity limitation is assumed when burning natural gas.”

Division responds: Agreed and correction was made.

Earthgrains Bakery requested: On Section B, condition 4(b) for each oven requires recordkeeping “of the amount of fuel combusted and hours of operation on a daily basis.”

Division responds: Agreed and correction was made to monthly basis.

Earthgrains Bakery requested: On Section D, condition 3 and 4 limit source-wide VOC emissions to 90 tons/year on a twelve-month rolling average.

Division responds: The limit is correct and stays.

Earthgrains Bakery requested: Section F, condition 11 mentions the “results of performance test(s) required by the permit.”

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Division responds: Section F is for general requirements; the testing language would apply only if the permit requires the facility to do so or upon KYDAQ request in the future.

**ORIGINAL**

**PUBLIC AND U.S. EPA REVIEW:**

Public notice was placed in the MESSENGER-INQUIRER on May 20, 2005. The comment period ended on June 20, 2005. There were no comments from the public. There were no comments from U.S. EPA.

**EMISSIONS AND OPERATING CAPS DESCRIPTION:**

Emissions Unit 01 (EU-1) - Bread Oven

Description:

Natural gas fired unit

Oven Rated Capacity: 2.65 MMBTU/hr

Construction commenced: 1970

Applicable Regulations:

401 KAR 52:030, Federally-enforceable permits for non-major sources.

401 KAR 61:020, Existing process operations.

Emissions Unit 02 (EU-2) - Bun Oven

Description:

Natural gas fired unit

Oven Rated Capacity: 2 MMBTU/hr

Construction commenced: 1974

Applicable Regulations:

401 KAR 52:030, Federally-enforceable permits for non-major sources.

401 KAR 61:020, Existing process operations.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

The applicant has requested a conditional major source permit that would be conditioned to limit total plant volatile organic compound (VOC) emissions to be 90 tons per year to preclude Title V applicability.

**CREDIBLE EVIDENCE:**

This permit contains provisions, which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.